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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**DECLARATION OF RACHEL B.
ABRAMS IN SUPPORT OF PLAINTIFFS'
MOTION TO RECONSIDER ORDER
DISMISSING CASES FOR FAILURE TO
COMPLY WITH PTO 10**

This Document Relates to:

Grier v. Uber Technologies, Inc., et al;
3:23-cv-05960-CRB

Rivera v. Uber Technologies, Inc., et al;
3:25-cv-03285-CRB

I, Rachel B. Abrams, declare:

1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

Plaintiff Grier:

2. Plaintiff Grier failed to respond to numerous efforts to reach her made by myself or my

1 staff between January 2, 2025 and November 14, 2025. These efforts were made via
2 phone call, text message, physical mail and email.

3 3. On November 17, 2023, after communicating with Plaintiff Grier, her case was filed in
4 the MDL. Our office informed Plaintiff of her discovery obligations, including the
5 Plaintiff Fact Sheet.

6 4. On May 28, 2024, Peiffer Wolf submitted Plaintiff Grier's Fact Sheet with the
7 information provided by Plaintiff, along with her signed verification.

8 5. On July 3, 2025, Uber's counsel informed our firm of alleged deficiencies with
9 Plaintiff's discovery.

10 6. Between July 3, 2025 and November 19, 2025, Plaintiff received numerous emails, text
11 messages, telephone calls, voice messages, and letters requesting that she contact our
12 office or provide requested information. These communications included five (5)
13 unsuccessful phone calls with no ability to leave voice messages, four (4) phone calls
14 with ability to leave voice messages, five (5) text messages, five (5) e-mails, and one (1)
15 letter. In these communications, we repeatedly explained the need for her continued
16 participation in the case, the risk that her case may be dismissed, and that we would need
17 to withdraw as counsel if she did not contact our office.

18 7. During that process, our firm also conducted investigations to try and locate alternative
19 phone numbers and email addresses for Plaintiff.

20 8. On September 16, 2025, we sent Plaintiff Grier a letter by U.S. certified mail explaining
21 that if she did not contact our firm by September 25, 2025, we would choose to
22 withdraw as counsel.

23 9. On October 17, 2025, our office sent Uber notice of our intent to withdraw from
24 Plaintiff's representation. Notice was issued prior to Uber's motion to dismiss.

25 10. On November 14, 2025, Plaintiff Grier resurfaced and commenced communication with
26 our firm via email. Between November 14, 2025 and November 19, 2025, Plaintiff
27 Grier was notified of her discovery obligations and the PFS verification requirement and
28 that failure to do so could result in the dismissal of her claim.

1 11. On November 19, 2025, Ms. Grier signed and returned her PFS Verification. The
2 Verification was uploaded to MDL Centrality and served that same day.

3 **Plaintiff Rivera:**

4 12. Plaintiff Rivera is incarcerated and communication with her has been incredibly
5 difficult. Counsel has utilized extensive efforts to reach Rivera, predating the filing of
6 Uber's motion to dismiss.

7 13. After we were finally able to communicate with her, Plaintiff Rivera returned her signed
8 PFS Verification to our office on November 18, 2025. The Verification was uploaded to
9 MDL Centrality and served that same day.

10 Executed this 26th day of November, 2025 in San Francisco, California.

11 /s/ Rachel B. Abrams
12 Rachel B. Abrams

13 *Counsel for Plaintiff*
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